

BakerHostetler

Baker&Hostetler LLP

1801 California Street
Suite 4400
Denver, Colorado 80202-2662
T 303.861.0600
F 303.861.7805
www.bakerlaw.com

June 16, 2023

Casie D. Collignon
direct dial: 303.764.4037
ccollignon@bakerlaw.com

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")

Dear Judge Karas:

As you know, we represent Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* action. Empress writes jointly with Plaintiff John Finn pursuant to the Court's November 14, 2022 Order [ECF No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The sixteenth status report is due today, June 16, 2023.

Since the parties' previous status report, they have finalized the settlement agreement and supporting documents, and Plaintiffs' preliminary approval motion. As previously noted, while the parties both strongly believe that the federal and state courts have concurrent jurisdiction over this matter, in order to avoid jurisdictional objections threatened by plaintiffs in later filed actions, Plaintiffs intend to file the settlement for approval in state court.

The parties are about to file the motion for preliminary approval. Therefore, we respectfully request that the Court continue to stay the later-filed actions during the settlement approval process. In accordance with the Court's November 14, 2022 Order, will provide another status update on June 30, 2023.

Honorable Kenneth M. Karas
April 21, 2023
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Respectfully submitted,



Casie D. Collignon

cc: All counsel of record (via ECF)